

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DONALD C. HUTCHINS

Plaintiff

v.

CARDIAC SCIENCE, INC., et al.,

Defendants

Civil Action: **04-30126-MAP**

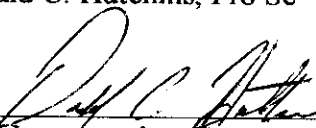
PLAINTIFF'S MOTION FOR SANCTIONS UNDER LOCAL RULE 1.3

The Plaintiff, Donald C. Hutchins respectfully requests that this Honorable Court apply sanctions as appropriate against Defendant's Counsel, Colleen Moran O'Neil, Esq. under Local Rule 1.3. The Plaintiff submits the attached Memorandum in Support of the Plaintiff's Motion for Sanctions.

The Plaintiff

Donald C. Hutchins, Pro Se

Dated: March 14, 2006


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(413) 567-0606
(413) 739-4060 (facsimile)

CERTIFICATE OF SERVICE

I, Donald C. Hutchins, 1047 Longmeadow Street, Longmeadow, Massachusetts 01106, hereby certify that I served a copy of the foregoing on the appropriate party by sending a copy by first class mail to: Randall T. Skaar, Esq., Patterson, Thunte, Skaar & Christensen, P.A., 4800 IDS Center, 80 South Eighth St., Minneapolis, MN 55402. Paul T. Rothschild, Esq., Bacon & Wilson P.C., 33 State Street, Springfield, MA 01103 John J. Egan, Esq., Egan, Flanagan and Cohen, P.C., 67 Market Street, Springfield, MA 01102-9035 Colleen Moran O'Neil, Esq., Calfee, Halter & Griswold LLP, 1400 Mc Donald Investment Center, 800 Superior Ave., Cleveland, OH 44114-2688

Dated: 3/14/06


Donald C. Hutchins